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7 Attorney for Salome Rivera-Guzman

8
9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 SALOME RIVERA-GUZMAN,

15 Defendant.
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Case No. 2:16-mj-553-PAL

STIPULATION TO CONTINUE
PRELIMINARY HEARING
(First Request)

17 IT IS HEREBY STIPULATED AND AGREED, by and between Daniel G. Bogden,
18 United States Attorney, and Cristina D. Silva, Assistant United States Attorney, counsel for the
19 United States of America, and Rene L. Valladares, Federal Public Defender, and
20 Monique Kirtley, Assistant Federal Public Defender, counsel for Salome Rivera-Guzman, that
21 the Preliminary Hearing currently scheduled on Thursday, August 18, 2016 at 4:00 p.m., be
22 vacated and continued to a date and time convenient to the Court, but no earlier than forty-five
23 (45) days.

24 This Stipulation is entered into for the following reasons:

25 1. Undersigned defense counsel was only recently assigned this case and filed her
26 notice of appearance on August 08, 2016.

2. The parties have entered negotiations and need the additional time to resolve this matter.

3. The defendant is detained at Pahrump and defense counsel needs additional time to schedule a visit to meet with the defendant to discuss the details of this case and any proposed plea agreement.

4. Additionally, denial of this request for continuance could result in a miscarriage of justice.

This is the first request for continuance filed herein.

DATED this 11th day of August, 2016.

RENE L. VALLADARES
Federal Public Defender

DANIEL G. BOGDEN
United States Attorney

/s/ Monique Kirtley
By _____
MONIQUE KIRTLEY
Assistant Federal Public Defender

/s/ Cristina D. Silva
By _____
CRISTINA D. SILVA
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,
4 Plaintiff,
5 v.
6 SALOME RIVERA-GUZMAN,
7 Defendant.
8

Case No. 2:16-mj-553-PAL

ORDER

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10 Based on the Stipulation of counsel and good cause appearing,

11 IT IS THEREFORE ORDERED that the Preliminary Hearing currently scheduled on
12 August 18, 2016 at the hour of 4:00 p.m., be vacated and continued to October 10, 2016 at
13 the hour of 4:00 p.m.

14 DATED this 12th day of August, 2016.

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17 UNITED STATES MAGISTRATE JUDGE
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